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9 *CitiMortgage, Inc.*

10 [ADDITIONAL COUNSEL LISTED ON SIGNATURE PAGES]

11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**

13 KIMAKO STRICKLAND,  
14 Plaintiff,

15 vs.

16 CENLAR CAPITAL CORPORATION  
17 d.b.a. CENLAR FSB; CITIMORTGAGE,  
18 INC.; and DOES 1-10, inclusive,  
19 Defendants.

Case No. 2:23-cv-00697-DJC-KJN

20 **STIPULATION**  
21 **TO EXTEND THE DEADLINE TO FILE**  
22 **DISPOSITIONAL DOCUMENTS**

23 Honorable Daniel J. Calabretta

1 Pursuant to Local Rule 144(a), Plaintiff Kimako Strickland and Defendants CitiMortgage,  
2 Inc. and Cenlar FSB (together “Defendants”), by and through their respective counsel of record,  
3 hereby stipulate and agree as follows:

4 1. On March 16, 2023, Plaintiff served each Defendant with the summons and  
5 complaint in the State Court Action.

6 2. On April 13, 2023, Defendants filed a Notice of Removal removing the State Court  
7 Action to this Court. ECF No. 1.

8 3. Defendants did not file an answer or otherwise respond to the Complaint before  
9 filing their Notice of Removal. Accordingly, Defendants’ responses to the Complaint were due on  
10 April 20, 2023, which was seven days after the Notice of Removal was filed. *See* Fed. R. Civ. P.  
11 81(c)(2)(C).

12 4. On April 18, 2023, pursuant to Local Rule 144(a), the Parties stipulated to a 28-day  
13 extension of time to respond to the Complaint. ECF No. 6.

14 5. After entering into their initial stipulation, the Parties began settlement  
15 negotiations. To facilitate those discussions, they requested an additional extension of the deadline  
16 to respond to the Complaint. ECF No. 10.

17 6. The Court allowed the Parties’ stipulated extension, extending the deadline to  
18 respond to the Complaint to June 19, 2023, and setting July 19, 2023 as the deadline for the Parties  
19 to file a joint status report. ECF No. 11.

20 7. On July 11, 2023, a Notice of Settlement and Joint Stipulation to Continue  
21 Deadlines was filed with this Court. ECF No. 14, 15.

22 8. On July 11, 2023, this Court issued a Minute Order (“July 11 Order”) requiring the  
23 Parties to file dispositional documents within twenty-one (21) days in accordance with the  
24 provisions of Local Rule 160 and vacated all other hearing dates and deadlines. ECF No. 15.

25 9. The Parties respectfully request a thirty (30) day extension of this deadline,  
26 extending the deadline for filing disposition documents to August 31, 2023. This requested  
27 deadline is not sought for any improper purpose or undue delay; rather, it is requested to provide  
28

1 the Parties with additional time to finalize their settlement agreement. Subsequent to the Court's  
 2 July 11 Order, counsel for Defendants conferred in order to prepare a draft settlement agreement,  
 3 which has now been drafted and provided to Plaintiff's counsel for review. More time was needed  
 4 to draft the settlement agreement than initially anticipated due, in part, to counsel's work in  
 5 connection with other matters, as well as due to illness. However, as noted, the settlement  
 6 agreement is now drafted and in the process of being finalized and executed by the Parties. At all  
 7 times in this action, settlement efforts have been cooperative and conducted in good faith. Thus,  
 8 the Parties respectfully request additional time to allow them time to finalize their settlement  
 9 agreement and resolve this litigation without further use of the Court's resources.

10 10. Before filing this joint stipulation, Defendants' counsel conferred with Plaintiff's  
 11 counsel, by email, and obtained Plaintiff's consent to the requested extension. Accordingly,  
 12 Plaintiff joins in the filing of this stipulation.

13  
 14 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and  
 15 between the Parties, and through their respective attorneys of record, as follows:

16  
 17 11. Defendant Cenlar FSB and Defendant CitiMortgage, Inc., and Plaintiff Kimako  
 18 Strickland, each through their counsel, respectfully request that the Court enter a limited extension  
 19 of the Parties' deadline to file dispositional documents to August 31, 2023.

20  
 21 **IT IS SO STIPULATED.**

22 Dated: August 03, 2023

MAYER BROWN LLP

23  
 24 By: /s/ Charles Turner  
 Charles Turner

25 Attorneys for Defendant  
 26 CitiMortgage, Inc.

1 Dated: August 03, 2023

WOLFE & WYMAN LLP

2  
3 By: /s/ Jessica B. Coffield  
(as authorized on 8/03/23)  
4 Jessica B. Coffield

5 Attorneys for Defendant  
6 Cenlar FSB

7  
8 Dated: August 03, 2023

CDLG, PC

9 By: /s/ Anthony Cara  
10 (as authorized on 8/03/23)  
Anthony Cara

11 Attorneys for Plaintiff  
12 Kimako Strickland

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14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15 Dated: August 3, 2023

/s/ Daniel J. Calabretta

16 THE HONORABLE DANIEL J. CALABRETTA  
17 UNITED STATES DISTRICT JUDGE  
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